

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

IN THE MATTER OF:

DELPHI CORPORATION, Chapter 11
Case No.: 05-44481 (RDD)
Debtor.

**EX-PARTE MOTION FOR LEAVE TO PAPER FILE CLAIMANT,
HAROLD WOODSON' BRIEF IN OPPOSITION TO OBJECTION TO CLAIM
(i) THIRD OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C.
§502(b) AND FED. R.BANKR.P.3007 TO CERTAIN (a) CLAIMS WITH
INSUFFICIENT DOCUMENTATION, (b) CLAIMS UNSUBSTANTIATED BY
DEBTORS' BOOKS AND RECORDS, AND (c) CLAIMS SUBJECT TO
MODIFICATION AND (II) MOTION TO ESTIMATE CONTINGENT AND
UNLIQUIDATED CLAIMS PURSUANT TO 11 U.S.C. §502(c)**

NOW COMES Claimant, Harold Woodson, by and through his attorneys, Leonard Kruse, P.C. and Kelly A. Kruse, states the following as his ex-parte motion for leave to paper file:

1. Leonard Kruse, P.C. represents one of the Claimants in the above captioned matter.
2. Leonard Kruse, P.C. and Kelly A. Kruse do not regularly practice in the bankruptcy court.
3. Leonard Kruse, P.C. and Kelly A. Kruse are approved for e-filing in the United States District Court for the Eastern District of Michigan, however, were recently advised that that approval does not extend to the bankruptcy court.

4. On November 20, 2006, Leonard Kruse, P.C. submitted, by overnight mail, its Motion for Admission to Practice, *Pro Hac Vice* and also requested a password for e-filing.

5. Leonard Kruse, P.C. and Kelly A. Kruse seek leave of the court to submit their Brief in Opposition to Objection to Claim by paper filing in light of the fact that they do not regularly practice in the bankruptcy court.

WHEREFORE, your Claimant Harold Woodson prays that this Honorable Court enter the enclosed Ex-Parte Order granting Leonard Kruse, P.C. permission to paper file their Brief.

LEONARD KRUSE, P.C.

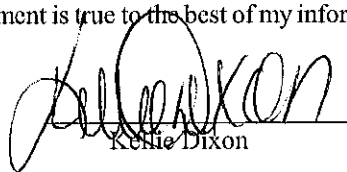
By:


KELLY A. KRUSE (P45538)
Attorney for Plaintiff

Dated: November 20, 2006

PROOF OF SERVICE

Kellie Dixon certifies that a copy of this instrument was served upon all of the attorneys on record for all of the parties in this within cause, by mailing same to their attention at their respective business addresses with postage fully prepaid thereon on **November 20, 2006**. I declare under penalty of perjury that the above statement is true to the best of my information, knowledge and belief.


Kellie Dixon